

1 **HAGENS BERMAN SOBOL SHAPIRO LLP**

2 Steve W. Berman (*pro hac vice*)

steve@hbsslaw.com

3 Stephanie A. Verdoia (*pro hac vice*)

stephaniev@hbsslaw.com

4 Ted Wojeik (*pro hac vice*)

tedw@hbsslaw.com

5 1301 Second Avenue, Suite 2000

Seattle, WA 98101

6 Telephone: (206) 623-7292

Facsimile: (206) 623-0594

7 Rio S. Pierce (*pro hac vice*)

riop@hbsslaw.com

8 Abby R. Wolf (*pro hac vice*)

abbyw@hbsslaw.com

9 715 Hearst Ave, Suite 300

Berkeley, CA 94710

10 Telephone: (510) 725-3000

Facsimile: (510) 725-3001

11 **PANISH SHEA BOYLE RAVIPUDI LLP**

12 Brian J. Panish (NV Bar No. 16123)

panish@psbr.law

13 Rahul Ravipudi (NV Bar No. 14750)

rravipudi@psbr.law

14 Adam Ellis (NV Bar No. 14514)

aellis@psbr.law

15 Ian Samson (NV Bar No. 15089)

isamson@psbr.law

16 300 S. Fourth Street, Suite 710

Las Vegas, NV 89101

17 Telephone: (702) 560-5520

18 *Counsel for Plaintiffs and the Proposed Class*

19 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

20 RICHARD GIBSON and ROBERTO
21 MANZO,

22 Plaintiffs,

23 v.

24 CENDYN GROUP, LLC, THE RAINMAKER
GROUP UNLIMITED, INC., CAESARS
25 ENTERTAINMENT INC., TREASURE
ISLAND, LLC, WYNN RESORTS
HOLDINGS, LLC, BLACKSTONE, INC.,
26 BLACKSTONE REAL ESTATE PARTNERS
VII L.P., JC HOSPITALITY, LLC.

27 Defendants.

28 Case No. 2:23-cv-00140-MMD-DJA

**DECLARATION OF STEVE W.
BERMAN IN SUPPORT OF
PLAINTIFFS' MEMORANDUM OF
POINTS AND AUTHORITIES IN
OPPOSITION TO DEFENDANTS'
JOINT MOTION TO DISMISS THE
FIRST AMENDED COMPLAINT WITH
PREJUDICE**

1 I, Steve Berman, declare as follows:

2 1. I am the managing partner of Hagens Berman Sobol Shapiro LLP. Hagens Berman
3 is counsel for the Plaintiffs in this case. I have full knowledge of the matters stated herein and
4 could and would testify thereto.

5 2. Attached as Exhibit A is a true and correct copy of charts, for the years 2012 to
6 2023, comparing the difference between (1) the Casino Hotel Guestroom Purchaser Price Index
7 (“PPI”) and Casino Hotel PPI; and (2) the Non-Casino Hotel Guestroom PPI and Non-Casino
8 Hotel PPI.

9 3. Attached as Exhibit B is a true and correct copy of the Statement of Interest of the
10 United States in *Duffy v. Yardi Sys Inc. et al.*, No. 2:23-cv-01391-RSL, ECF No. 149 (March 1,
11 2024).

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct. Executed this 6th day of March 2024, at Seattle, Washington.

14 _____
15 s/ Steve Berman
Steve W. Berman